

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Judge: Honorable Charles R. Breyer
Date: January 6, 2026
Time: 10:00 A.M. PT
Courtroom: 6 –17th Floor (zoom)

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. I submit this declaration in support of Plaintiff's Opposition to Defendants'
8 Motion for Partial Summary Judgment.

9 3. The exhibits referred below are attached to Plaintiff's Opposition to Motion for
10 Partial Summary Judgment. They are filed either (1) publicly, (2) in connection with Plaintiff's
11 Administrative Motion to Consider Whether Another Party's Material Should be Sealed, or (3) in
12 connection with Plaintiff's Administrative Motion to Seal.

13 4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the June
14 11-12, 2025, 30(b)(6) Deposition of Elizabeth Ross. This document is filed under seal.

15 5. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of Exhibit
16 3308-B to the 30(b)(6) Deposition of Hannah Nilles. This document is filed under seal.

17 6. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit 434 to the
18 Deposition of Gus Fuldner. This document is filed under seal.

19 7. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit 2707 to the
20 Deposition of Andrew Hasbun. This document is filed under seal.

21 8. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit 1110 to the
22 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

23 9. Attached hereto as **Exhibit 6** is a true and correct copy of Exhibit 2005 to the
24 30(b)(6) Deposition of Mariana Esteves. This document is filed under seal.

25 10. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the
26 August 28, 2025, 30(b)(6) Deposition of Mariana Esteves. This document is filed under seal.

27 11. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the June
28 27, 2025, Deposition of Jaylynn Dean. This document has been redacted on the public docket

and filed unredacted under seal.

12. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the June 30, 2025, 30(b)(6) Deposition of Hannah Nilles. This document is filed under seal.

13. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from Exhibit 1052 to the 30(b)(6) Deposition of Elizabeth Ross. This document is filed under seal.

14. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the August 25-26, 2025, 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

15. Attached hereto as **Exhibit 12** is a true and correct copy of Exhibit 1966B to the 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

16. Attached hereto as **Exhibit 13** is a true and correct copy of Exhibit 1693 to the 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

17. Attached hereto as **Exhibit 14** is a true and correct copy of Exhibit 1092 to the 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

18. Attached hereto as **Exhibit 15** is a true and correct copy of Exhibit 2000 to the 30(b)(6) Deposition of Mariana Esteves. This document is filed under seal.

19. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the March 26-27, 2025, 30(b)(6) Deposition of Gus Fuldner. This document is filed under seal.

20. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the June 25, 2025, 30(b)(6) Deposition of Sunny Wong. This document is filed under seal.

21. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the July 15, 2025, 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

22. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from the July 16, 2025, 30(b)(6) Deposition of Greg Brown. This document is filed under seal.

23. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts of Exhibit 2003 to the 30(b)(6) Deposition of Mariana Esteves. This document is filed under seal.

24. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from the July 23, 2025, Deposition of Hassan Turay. This document has been redacted on the public docket and filed unredacted under seal.

25. Attached hereto as **Exhibit 22** is a true and correct copy of a document bates stamped UBER-MDL3084-BW-00027896. This document has been filed under seal.

26. Attached hereto as **Exhibit 23** is a true and correct copy of Exhibit 1884 to the 30(b)(6) Deposition of Hannah Nilles. This document has been filed under seal.

27. Attached hereto as **Exhibit 24** is a true and correct copy of Exhibit 283 to the Deposition of Tracey Breeden. This document has been filed under seal.

28. Attached hereto as **Exhibit 25** is a true and correct copy of Exhibit 613 to the JCCP Deposition of Kate Parker. This document has been filed under seal.

29. **Exhibit 26** was intentionally omitted.

30. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from Exhibit 1692 to the 30(b)(6) Deposition of Greg Brown.

31. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts from the August 7, 2025, 30(b)(6) Deposition of Hannah Nilles. This document has been filed under seal.

32. Attached hereto as **Exhibit 29** is a true and correct copy of Exhibit 1239 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

33. Attached hereto as **Exhibit 30** is a true and correct copy of Exhibit 2067A to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

34. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts from the July 23, 2025, 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

35. Attached hereto as **Exhibit 32** is a true and correct copy of Exhibit 1240 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

36. Attached hereto as **Exhibit 33** is a true and correct copy of Exhibit 1249 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

37. Attached hereto as **Exhibit 34** is a true and correct copy of Exhibit 1248 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

38. Attached hereto as **Exhibit 35** is a true and correct copy of Exhibit 3900 to the Deposition of Michael Akamine. This document has been filed under seal.

39. Attached hereto as **Exhibit 36** is a true and correct copy of excerpts from the July

23, 2025, 30(b)(6) Deposition of Hannah Nilles. This document has been filed under seal.

40. Attached hereto as **Exhibit 37** is a true and correct copy of excerpts from Exhibit 636 to the Deposition of Roger Kaiser. This document has been filed under seal.

41. Attached hereto as **Exhibit 38** is a true and correct copy of excerpts from Exhibit 1062 to the 30(b)(6) Deposition of Elizabeth Ross. This document has been filed under seal.

42. Attached hereto as **Exhibit 39** is a true and correct copy of Exhibit 1049 to the 30(b)(6) Deposition of Elizabeth Ross. This document has been filed under seal.

43. Attached hereto as **Exhibit 40** is a true and correct copy of Exhibit 1570 to the 30(b)(6) Deposition of Todd Gaddis. This document has been filed under seal.

44. Attached hereto as **Exhibit 41** is a true and correct copy of Exhibit 1736 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

45. Attached hereto as **Exhibit 42** is a true and correct copy of Exhibit 1102 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

46. Attached hereto as **Exhibit 43** is a true and correct copy of excerpts of Exhibit 1930 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

47. Attached hereto as **Exhibit 44** is a true and correct copy of a document bates stamped UBER_JCCP_MDL_000108957. This document has been filed under seal.

48. Attached hereto as **Exhibit 45** is a true and correct copy of Exhibit 1104 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

49. Attached hereto as **Exhibit 46** is a true and correct copy of Exhibit 1101 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

50. Attached hereto as **Exhibit 47** is a true and correct copy of Exhibit 617 to the JCCP Deposition of Kate Parker. This document has been filed under seal.

51. Attached hereto as **Exhibit 48** is a true and correct copy of excerpts from the July 1, 2025, Deposition of Dara Khosrowshahi. This document has been filed under seal.

52. Attached hereto as **Exhibit 49** is a true and correct copy of excerpts of Exhibit 1100 to the 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

53. Attached hereto as **Exhibit 50** is a true and correct copy of excerpts from the July

11, 2025, Deposition of Todd Gaddis. This document has been filed under seal.

54. Attached hereto as **Exhibit 51** is a true and correct copy of excerpts from the June 17, 2025, 30(b)(6) Deposition of Greg Brown. This document has been filed under seal.

55. Attached hereto as **Exhibit 52** is a true and correct copy of Exhibit 1883 to the 30(b)(6) Deposition of Hannah Nilles. This document has been filed under seal.

56. Attached hereto as **Exhibit 53** is a true and correct copy of excerpts from the October 14, 2025, 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

57. Attached hereto as **Exhibit 54** is a true and correct copy of excerpts from the July 15, 2025, 30(b)(6) Deposition of Mariana Esteves. This document has been filed under seal.

58. Attached hereto as **Exhibit 55** is a true and correct copy of Exhibit 2071 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

59. Attached hereto as **Exhibit 56** is a true and correct copy of Exhibit 2202 to the Deposition of Gus Fuldner. This document has been filed under seal.

60. Attached hereto as **Exhibit 57** is a true and correct copy of Exhibit 1243 to the 30(b)(6) Deposition of Sunny Wong. This document has been filed under seal.

61. Attached hereto as **Exhibit 58** is a true and correct copy of Exhibit 645 to the Deposition of Roger Kaiser. This document has been filed under seal.

62. Attached hereto as **Exhibit 59** is a true and correct copy of excerpts from the May 13, 2025, Deposition of Rebecca Payne. This document has been filed under seal.

63. Attached hereto as **Exhibit 60** is a true and correct copy of Exhibit 2549 to the Deposition of Rebecca Payne. This document has been filed under seal.

64. Attached hereto as **Exhibit 61** is a true and correct copy of Exhibit 1197 to the Deposition of Jill Hazelbaker. This document has been filed under seal.

65. Attached hereto as **Exhibit 62** is a true and correct copy of Uber Technologies, Inc. 2025 Proxy Statement.

66. Attached hereto as **Exhibit 63** is a true and correct copy of a document bates stamped ACCURATE001. This document has been filed under seal.

67. Attached hereto as **Exhibit 64** is a true and correct copy of a document bates

1 stamped UBER-MDL3084-BW-00012056. This document has been filed under seal.

2 68. Attached hereto as **Exhibit 65** is a true and correct copy of a document bates
3 stamped CHECKR000891. This document has been filed under seal.

4 69. Attached hereto as **Exhibit 66** is a true and correct copy of a document bates
5 stamped UBER_JCCP_MDL_005696277. This document has been filed under seal.

6 70. Attached hereto as **Exhibit 67** is a true and correct copy of a document bates
7 stamped CHECKR000894. This document has been filed under seal.

8 71. Attached hereto as **Exhibit 68** is a true and correct copy of excerpts from the
9 August 7, 2025, 30(b)(6) Wave I Deposition of Hannah Nilles. This document has been filed
10 under seal.

11 72. Attached hereto as **Exhibit 69** is a true and correct copy of a document bates
12 stamped UBER-MDL3084-BW-00027874. This document has been filed under seal.

13 73. Attached hereto as **Exhibit 70** is a true and correct copy of a document bates
14 stamped UBER-MDL3084-DFS00003621. This document has been filed under seal.

15 74. Attached hereto as **Exhibit 71** is a true and correct copy of the Expert Report of
16 Robert Johnson.

17 75. Attached hereto as **Exhibit 72** is a true and correct copy of excerpts of Exhibit
18 1055 to the 30(b)(6) Deposition of Elizabeth Ross. This document has been filed under seal.

19 76. Attached hereto as **Exhibit 73** is a true and correct copy of excerpts from the
20 Expert Report of Jason Morris. This document has been filed under seal.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 10th day of December, 2025 in San Francisco, California.

23
24 /s/ Sarah R. London

25 Sarah R. London
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